

REMARKS

In the Final Office Action¹, the Examiner rejected claims 1-21 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent Application No. 2005/0065951 to Liston et al. ("Liston") in view of U.S. Patent No. 6,360,223 to Ng et al. ("Ng").

Applicants have amended claims 1, 15, 18, and 21. Claims 1-21 remain pending.

I. Regarding the rejection of claims 1-21 under 35 U.S.C. § 103(a) as being unpatentable over *Liston* in view of *Ng*

Applicants respectfully request that the Examiner reconsider and withdraw the rejection of claims 1-21 because a *prima facie* case of obviousness has not been established with respect to these claims.

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). M.P.E.P. § 2142, 8th Ed., Rev. 2 (May 2004), p. 2100-128.

A *prima facie* case of obviousness has not been established because, among other things, neither *Liston* nor *Ng*, taken alone or in combination, teach or suggest each and every element recited by Applicants' claims.

¹ The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

Claim 1 recites a computer program product, tangibly embodied in an information carrier, comprising instructions operable to cause data processing apparatus to:

derive one or more data dependency relationships from the data mappings, each data dependency relationship being directed from a first controller to a second controller and from the second controller to one model, one data dependency relationship being derived whenever there is at least one data mapping between the first controller and the second controller and between the second controller and the model

(emphasis added). *Liston* does not teach or suggest at least these elements.

Liston discloses “computer-implemented systems, methods, and tools for dynamically synchronizing and coordinating views and controls of diverse, multidisciplinary project data” (paragraph 0012).

Paragraph 0009 of *Liston* discloses a Model-View-Controller (MVC) application architecture. The MVC application architecture comprises applications 110, 120, and 130 (Fig. 1B). Model 111 “represents data and rules, e.g. access and modification, specific to application 110,” “notifies view 112 when it changes and enables view 112 to query model 111 about its state,” and “enables controller 113 to access application functionality” (paragraph 0009). “View 112 defines how model 111 is shown and forwards user feedback to controller 113” (paragraph 0009). “Controller 113 defines application behavior and handles user interaction” (paragraph 0009).

Fig. 1B of *Liston* discloses a controller, view, and model. Even assuming that a data dependency exists, which Applicants do not concede, there is no “data dependency relationship being directed from a first controller to a second controller and from the second controller to one model,” as recited in claim 1. Moreover, there is no teaching or suggestion of “one data dependency relationship being derived whenever

there is at least one data mapping between the first controller and the second controller and between the second controller and the model," as further recited in claim 1.

Paragraph 0042 of *Liston* also does not teach the claimed "each data dependency relationship being directed from a first controller to a second controller and from the second controller to one model, one data dependency relationship being derived whenever there is at least one data mapping between the first controller and the second controller and between the second controller and the model." Paragraph 0042 discloses a CIFE iRoom depicted in Fig. 2.

Fig. 2 depicts a "Shared Project Data Model 200 [that] includes Domain Models 230 and Relation Model 240" (paragraph 0042). Data elements, "stored in the data structures of the various applications," are mapped "to a Shared Project Data Model 200 in a bidirectional fashion" (Paragraph 0042). There is no teaching or suggestion that the models or mapping constitute the claimed "each data dependency relationship being directed from a first controller to a second controller and from the second controller to one model, one data dependency relationship being derived whenever there is at least one data mapping between the first controller and the second controller and between the second controller and the model," as recited in claim 1.

The Examiner correctly notes that *Liston* "does not explicitly indicate 'and visualize the data dependency relationships by displaying a link for each of one or more data dependency relationships, each link showing a direction of data dependency'" (Final Office Action at page 3). However, the Examiner alleges that *Ng* teaches this element of claim 1.

Even assuming this allegation is true, which Applicants do not concede, *Ng* fails to cure the deficiencies of *Liston* discussed above. *Ng* discloses “a user interface to view and enter information relating to mapping rules for use with a mapping tool that maps data between data models according to the rules” (col. 3, lines 12-14). *Ng* does not teach or suggest deriving “one or more data dependency relationships from the data mappings, each data dependency relationship being directed from a first controller to a second controller and from the second controller to one model, one data dependency relationship being derived whenever there is at least one data mapping between the first controller and the second controller and between the second controller and the model,” as recited in claim 1.

Accordingly, *Liston* and *Ng* fail to establish a *prima facie* case of obviousness with respect to claim 1, at least because the references fail to teach each and every element of the claim. Claims 2-14 depend from claim 1 and are thus also allowable for at least the same reasons as claim 1.

Independent claims 15, 18, and 21, though of different scope from claim 1, recite limitations similar to those set forth above with respect to claim 1. Claims 15, 18, and 21 are therefore allowable for at least the reasons presented above. Claims 16-17 and 19-20 are also allowable at least due to their dependence from claims 15 and 18 respectively.

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II. Conclusion

In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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